EXHIBIT A

Exhibit A – Proposed Constructions and Supporting Intrinsic and Extrinsic Evidence

A. U.S. Patent No. 9,137,701

Claim Term	Headwater's Proposed Construction and Supporting Evidence	Samsung's Proposed Construction and Supporting Evidence
"user of the device	Not indefinite; plain and ordinary meaning.	Indefinite.
perceiving any benefit from that	Supporting Evidence:	Supporting Evidence:
application"	Intrinsic Evidence	Intrinsic Evidence
(claim 2)	'701 patent at 5:57-6:18, 7:42-8:42, 11:16-12:27, 13:10-14:24, 15:60-16:54, 18:29-60, 20:1-40, 24:21-55, 25:22-26:2, and associated Figures; Figures 14-18,	8:15-22
	and associated text. For avoidance of doubt, because the specifications of the	14:56-67
	asserted patents at issue for claim construction disputes are materially identical, citations to the '701 patent specification should be understood to also refer to the	16:25-28
	corresponding portions of the specifications of the other asserted patents at issue.	56:1-5
	US Provisional Application 61/206354: Paragraphs [0063]-[0110], [0133]-[0143], [0149], [0161]-[0170], [0188]-[0189], [0202]-[0209], [0222]-[0236], [0258],	56:56-60
	[0305]-[0311], [0355]-[0360], [0375]-[0378], and associated Figures.	59:1-6
	US Provisional Application 61/348022: [0038]-[0043], [0053]-[0054], [0058]-[0062], [0069]-[0070], [0164], [0212], Figures 3, 20, and associated discussion	61:37-46
		Extrinsic Evidence
	7/28/2015 Office Action, File History of USPN 9,277,445; 10/26/2015 Applicant Amendment and Response, File History of USP 9,277,445	
	Extrinsic Evidence	

HW_00046181 (Human-Computer Interaction Fundamentals, 2009); HW_00046176 (Human Machine Interaction: Research Results of the MMI Program, 2009); HW_00046172 (Webster's II New Riverside Desk Dictionary); HW_00046173 (google.com); HW_00046186 (Oxford English Dictionary); HW_00046186 (Oxford English Dictionary); HW_00046187 (Merriam-Webster); HW_00046191 (Dictionary.com); HW_00046184 (Oxford English Dictionary);	
Expert testimony of Dr. Douglas Chrissan evidencing that one of ordinary skill in the art would understand the scope of "user of the device perceiving any benefit from that application" with reasonable certainty. <i>See</i> Chrissan Declaration served upon Samsung in accordance with P.R. 4-3(B).	

B. U.S. Patent No. 9,143,976

Claim Term	Headwater's Proposed Construction and Supporting Evidence	Samsung's Proposed Construction and Supporting Evidence
"user of the device	Not indefinite; plain and ordinary meaning.	Indefinite.
perceiving any	Supporting Evidence:	Supporting Evidence:
benefit from that application" (claim 2)	<u>Intrinsic Evidence</u>	Intrinsic Evidence
	'701 patent at 5:57-6:18, 7:42-8:42, 11:16-12:27, 13:10-14:24, 15:60-16:54, 18:29-60, 20:1-40, 24:21-55, 25:22-26:2, and associated Figures; Figures 14-18,	8:15-22
	and associated text. For avoidance of doubt, because the specifications of the	14:56-67
	asserted patents at issue for claim construction disputes are materially identical, citations to the '701 patent specification should be understood to also refer to the	16:25-28
	corresponding portions of the specifications of the other asserted patents at issue.	56:1-5
		56:56-60

US Provisional Application 61/206354: Paragraphs [0063]-[0110], [0133]-[0143], [0149], [0161]-[0170], [0188]-[0189], [0202]-[0209], [0222]-[0236], [0258],	59:1-6
[0305]-[0311], [0355]-[0360], [0375]-[0378], and associated Figures.	61:37-46
US Provisional Application 61/348022: [0038]-[0043], [0053]-[0054], [0058]-[0062], [0069]-[0070], [0164], [0212], Figures 3, 20, and associated discussion	Extrinsic Evidence
7/28/2015 Office Action, File History of USPN 9,277,445; 10/26/2015 Applicant Amendment and Response, File History of USP 9,277,445	
Extrinsic Evidence	
HW_00046181 (Human-Computer Interaction Fundamentals, 2009); HW_00046176 (Human Machine Interaction: Research Results of the MMI Program, 2009); HW_00046172 (Webster's II New Riverside Desk Dictionary); HW_00046173 (google.com); HW_00046186 (Oxford English Dictionary); HW_00046186 (Oxford English Dictionary); HW_00046187 (Merriam-Webster); HW_00046191 (Dictionary.com); HW_00046184 (Oxford English Dictionary);	
Expert testimony of Dr. Douglas Chrissan evidencing that one of ordinary skill in the art would understand the scope of "user of the device perceiving any benefit from that application" with reasonable certainty. <i>See</i> Chrissan Declaration served upon Samsung in accordance with P.R. 4-3(B).	

C. U.S. Patent No. 9,271,184

Claim Term	Headwater's Proposed Construction and Supporting Evidence	Samsung's Proposed Construction and Supporting Evidence
"user of the device	Not indefinite; plain and ordinary meaning.	Indefinite.
perceiving any benefit from	Supporting Evidence:	Supporting Evidence:

that	Intrinsic Evidence	Intrinsic Evidence
application"	Indinsic Evidence	Intimsic Evidence
(claim 2)	'701 patent at 5:57-6:18, 7:42-8:42, 11:16-12:27, 13:10-14:24, 15:60-16:54, 18:29-60,	8:17-24
	20:1-40, 24:21-55, 25:22-26:2, and associated Figures; Figures 14-18, and associated text. For avoidance of doubt, because the specifications of the asserted patents at issue	14:57-15:1
	for claim construction disputes are materially identical, citations to the '701 patent specification should be understood to also refer to the corresponding portions of the	16:26-29
	specifications of the other asserted patents at issue.	56:1-5
	US Provisional Application 61/206354: Paragraphs [0063]-[0110], [0133]-[0143],	56:56-60
	[0149], [0161]-[0170], [0188]-[0189], [0202]-[0209], [0222]-[0236], [0258], [0305]- [0311], [0355]-[0360], [0375]-[0378], and associated Figures.	59:1-6
	US Provisional Application 61/348022: [0038]-[0043], [0053]-[0054], [0058]-[0062],	61:37-46
	[0069]-[0070], [0164], [0212], Figures 3, 20, and associated discussion	Extrinsic Evidence
	7/28/2015 Office Action, File History of USPN 9,277,445; 10/26/2015 Applicant Amendment and Response, File History of USP 9,277,445	
	Extrinsic Evidence	
	HW_00046181 (Human-Computer Interaction Fundamentals, 2009); HW_00046176 (Human Machine Interaction: Research Results of the MMI Program, 2009); HW_00046172 (Webster's II New Riverside Desk Dictionary); HW_00046173 (google.com); HW_00046186 (Oxford English Dictionary); HW_00046186 (Oxford English Dictionary); HW_00046187 (Merriam-Webster); HW_00046191 (Dictionary.com); HW_00046184 (Oxford English Dictionary);	
	Expert testimony of Dr. Douglas Chrissan evidencing that one of ordinary skill in the art would understand the scope of "user of the device perceiving any benefit from that application" with reasonable certainty. <i>See</i> Chrissan Declaration served upon Samsung in accordance with P.R. 4-3(B).	

D. U.S. Patent No. 9,277,433

Claim Term	Headwater's Proposed Construction and Supporting Evidence	Samsung's Proposed Construction and Supporting Evidence
"user of the device perceiving any benefit from that application" (claim 3)	Not indefinite; plain and ordinary meaning. Supporting Evidence: Intrinsic Evidence '701 patent at 5:57-6:18, 7:42-8:42, 11:16-12:27, 13:10-14:24, 15:60-16:54, 18:29-60, 20:1-40, 24:21-55, 25:22-26:2, and associated Figures; Figures 14-18, and associated text. For avoidance of doubt, because the specifications of the asserted patents at issue for claim construction disputes are materially identical, citations to the '701 patent specification should be understood to also refer to the corresponding portions of the specifications of the other asserted patents at issue.	Indefinite. Supporting Evidence: Intrinsic Evidence 8:15-22 14:56-67 16:25-28 56:1-5
	US Provisional Application 61/206354: Paragraphs [0063]-[0110], [0133]-[0143], [0149], [0161]-[0170], [0188]-[0189], [0202]-[0209], [0222]-[0236], [0258], [0305]-[0311], [0355]-[0360], [0375]-[0378], and associated Figures. US Provisional Application 61/348022: [0038]-[0043], [0053]-[0054], [0058]-[0062], [0069]-[0070], [0164], [0212], Figures 3, 20, and associated discussion 7/28/2015 Office Action, File History of USPN 9,277,445; 10/26/2015 Applicant Amendment and Response, File History of USP 9,277,445 Extrinsic Evidence HW_00046181 (Human-Computer Interaction Fundamentals, 2009); HW_00046176 (Human Machine Interaction: Research Results of the MMI Program, 2009);	56:56-60 59:1-6 61:37-46 Extrinsic Evidence

HW_00046172 (Webster's II New Riverside Desk Dictionary); HW_00046173 (google.com); HW_00046186 (Oxford English Dictionary); HW_00046186 (Oxford English Dictionary); HW_00046187 (Merriam-Webster); HW_00046191 (Dictionary.com); HW_00046184 (Oxford English Dictionary);	
Expert testimony of Dr. Douglas Chrissan evidencing that one of ordinary skill in the art would understand the scope of "user of the device perceiving any benefit from that application" with reasonable certainty. <i>See</i> Chrissan Declaration served upon Samsung in accordance with P.R. 4-3(B).	

E. U.S. Patent No. 9,277,445

Claim Term	Headwater's Proposed Construction and Supporting Evidence	Samsung's Proposed Construction and Supporting Evidence
"user of the device	Not indefinite; plain and ordinary meaning.	Indefinite.
perceiving any	Supporting Evidence:	Supporting Evidence:
benefit from that	<u>Intrinsic Evidence</u>	Intrinsic Evidence
application" (claim 2)	'701 patent at 5:57-6:18, 7:42-8:42, 11:16-12:27, 13:10-14:24, 15:60-16:54, 18:29-60, 20:1-40, 24:21-55, 25:22-26:2, and associated Figures; Figures 14-18, and associated text. For avoidance of doubt, because the specifications of the asserted patents at issue for claim construction disputes are materially identical, citations to the '701 patent specification should be understood to also refer to the corresponding portions of the	8:17-24 14:57-15:1 16:26-29
	specifications of the other asserted patents at issue.	56:1-5
	US Provisional Application 61/206354: Paragraphs [0063]-[0110], [0133]-[0143], [0149], [0161]-[0170], [0188]-[0189], [0202]-[0209], [0222]-[0236], [0258], [0305]-[0311], [0355]-[0360], [0375]-[0378], and associated Figures.	56:56-60 59:1-6
	[[0311], [0333]-[0300], [0373]-[0376], and associated rigures.	37.1-0

US Provisional Application 61/348022: [0038]-[0043], [0053]-[0054], [0058]-[0062], [0069]-[0070], [0164], [0212], Figures 3, 20, and associated discussion	61:37-46
7/28/2015 Office Action, File History of USPN 9,277,445; 10/26/2015 Applicant	Extrinsic Evidence
Amendment and Response, File History of USP 9,277,445 Extrinsic Evidence	
HW_00046181 (Human-Computer Interaction Fundamentals, 2009); HW_00046176 (Human Machine Interaction: Research Results of the MMI Program, 2009); HW_00046172 (Webster's II New Riverside Desk Dictionary); HW_00046173 (google.com); HW_00046186 (Oxford English Dictionary); HW_00046186 (Oxford English Dictionary); HW_00046187 (Merriam-Webster); HW_00046191 (Dictionary.com); HW_00046184 (Oxford English Dictionary);	
Expert testimony of Dr. Douglas Chrissan evidencing that one of ordinary skill in the art would understand the scope of "user of the device perceiving any benefit from that application" with reasonable certainty. <i>See</i> Chrissan Declaration served upon Samsung in accordance with P.R. 4-3(B).	

F. U.S. Patent No. 9,251,578

Claim Term	Headwater's Proposed Construction and Supporting Evidence	Samsung's Proposed Construction and Supporting Evidence
"user of the device	Not indefinite; plain and ordinary meaning.	Indefinite.
perceiving any	Supporting Evidence:	Supporting Evidence:
benefit from that	Intrinsic Evidence	Intrinsic Evidence
application" (claim 4)	'701 patent at 5:57-6:18, 7:42-8:42, 11:16-12:27, 13:10-14:24, 15:60-16:54, 18:29-60, 20:1-40, 24:21-55, 25:22-26:2, and associated Figures; Figures 14-18, and associated	8:23-31

text. For avoidance of doubt, because the specifications of the asserted patents at issue	15:7-18
for claim construction disputes are materially identical, citations to the '701 patent specification should be understood to also refer to the corresponding portions of the	16:43-46
specifications of the other asserted patents at issue.	57:16-21
US Provisional Application 61/206354: Paragraphs [0063]-[0110], [0133]-[0143], [0149], [0161]-[0170], [0188]-[0189], [0202]-[0209], [0222]-[0236], [0258], [0305]-	58:6-10
[0311], [0355]-[0360], [0375]-[0378], and associated Figures.	60:20-25
US Provisional Application 61/348022: [0038]-[0043], [0053]-[0054], [0058]-[0062], [0069]-[0070], [0164], [0212], Figures 3, 20, and associated discussion	62:61-63:3
7/28/2015 Office Action, File History of USPN 9,277,445; 10/26/2015 Applicant Amendment and Response, File History of USP 9,277,445	Extrinsic Evidence
Extrinsic Evidence	
HW_00046181 (Human-Computer Interaction Fundamentals, 2009); HW_00046176 (Human Machine Interaction: Research Results of the MMI Program, 2009); HW_00046172 (Webster's II New Riverside Desk Dictionary); HW_00046173 (google.com); HW_00046186 (Oxford English Dictionary); HW_00046186 (Oxford English Dictionary); HW_00046187 (Merriam-Webster); HW_00046191 (Dictionary.com); HW_00046184 (Oxford English Dictionary);	
Expert testimony of Dr. Douglas Chrissan evidencing that one of ordinary skill in the art would understand the scope of "user of the device perceiving any benefit from that application" with reasonable certainty. <i>See</i> Chrissan Declaration served upon Samsung in accordance with P.R. 4-3(B).	

G. U.S. Patent No. 9,609,544

Claim Term	Headwater's Proposed Construction and Supporting Evidence	Samsung's Proposed Construction and Supporting Evidence
"user of the device	Not indefinite; plain and ordinary meaning.	Indefinite.
perceiving any benefit from that application" (claim 2)	Supporting Evidence:	Supporting Evidence:
	Intrinsic Evidence	Intrinsic Evidence
	'701 patent at 5:57-6:18, 7:42-8:42, 11:16-12:27, 13:10-14:24, 15:60-16:54, 18:29-60,	10:31-39
	20:1-40, 24:21-55, 25:22-26:2, and associated Figures; Figures 14-18, and associated text. For avoidance of doubt, because the specifications of the asserted patents at issue for claim construction disputes are materially identical, citations to the '701 patent specification should be understood to also refer to the corresponding portions of the specifications of the other asserted patents at issue.	17:15-26
		18:51-54
		59:23-27
	US Provisional Application 61/206354: Paragraphs [0063]-[0110], [0133]-[0143], [0149], [0161]-[0170], [0188]-[0189], [0202]-[0209], [0222]-[0236], [0258], [0305]-	60:12-16
	[0311], [0355]-[0360], [0375]-[0378], and associated Figures.	62:26-31
	US Provisional Application 61/348022: [0038]-[0043], [0053]-[0054], [0058]-[0062],	64:67-65:9
	[0069]-[0070], [0164], [0212], Figures 3, 20, and associated discussion	Extrinsic Evidence
	7/28/2015 Office Action, File History of USPN 9,277,445; 10/26/2015 Applicant Amendment and Response, File History of USP 9,277,445	
	Extrinsic Evidence	
	HW_00046181 (Human-Computer Interaction Fundamentals, 2009); HW_00046176 (Human Machine Interaction: Research Results of the MMI Program, 2009);	

HW_00046172 (Webster's II New Riverside Desk Dictionary); HW_00046173 (google.com); HW_00046186 (Oxford English Dictionary); HW_00046186 (Oxford English Dictionary); HW_00046187 (Merriam-Webster); HW_00046191 (Dictionary.com); HW_00046184 (Oxford English Dictionary);	
Expert testimony of Dr. Douglas Chrissan evidencing that one of ordinary skill in the art would understand the scope of "user of the device perceiving any benefit from that application" with reasonable certainty. <i>See</i> Chrissan Declaration served upon Samsung in accordance with P.R. 4-3(B).	